

To: Jones, Ricardo[Jones.Ricardo@epa.gov]
Cc: Jamin Huang (jamin.huang@bayer.com)[jamin.huang@bayer.com]; Valent Central Files[VCF@valent.com]
From: Shen, Sue
Sent: Thur 6/9/2016 5:50:23 PM
Subject: RE: Additional Clothianidin CFS Questions
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Clothianidin CF protocol and six amendments .pdf

Hi, Ricardo :

Reply from Dr. Allen Olmstead today .

1. The wording in the final report is not clear. The statement refers to sampling of monitoring hives. All of the monitoring hives were sampled June 18-20 during which time incoming trapped pollen and uncapped nectar from inside the monitoring hives were collected. None of the 'study' hives that received control or treatment solutions were sampled at this time. As this sampling occurred before the exposure began, there is effectively no difference between these study hives and the monitoring hives. They all originated from the same package installation and were kept at the same apiaries.
2. For this study, samples were only collected from one frame side per hive. Bee bread was scooped out of individual cells with a small spatula. The uncapped nectar was collected with a plastic spoon in which the comb is destroyed in a small area of the frame as the nectar (or honey in the case of capped) is effectively squeezed out. For studies conducted last year and moving forward, the spoon has been replaced by a 5 mL syringe with a luer slip and multiple frames are being sampled.

Please see a complete set of the CF signed protocol including all of six amendments in the attachment.

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From: Jones, Ricardo [mailto:Jones.Ricardo@epa.gov]
Sent: Thursday, June 02, 2016 3:12 PM
To: Shen, Sue
Cc: Jamin Huang (jamin.huang@bayer.com)
Subject: Additional Clothianidin CFS Questions

Sue,

Thanks for the last response. I've got a couple of more questions from our assessors on the clothianidin feeding study report:

1. On p. 25, the final report says, "Samples of pollen and nectar were collected from all hives at 4 sites per day on June 18, 19, and 20 for a determination of possible pre-exposure to pesticides." The testing schedule (p. 30) does not indicate that any sampling was done other than from the monitoring hive and no other results are available. I assume in this case that residue samples were not taken from the study hives (non-monitoring) at CCA3, but would appreciate confirmation.
2. The final report does not indicate how sampling of hive matrices was conducted (i.e. how many subsamples from how many frames), which would be helpful information for our review. The final report also did not include the final study protocol, which would also be helpful to see (not sure if it was just the generic "neonicotinoid" protocol the Agencies provide comments on in April, 2014, with our comments incorporated).

In addition, we've noticed that the version of the feeding study protocol we currently have (2014) does not appear to be the final-signed version. Could you forward me a copy of the final version so that we can be sure that we are referencing the most up-to-date document.

Thanks,

Ricardo Jones

Chemical Review Manager

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